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Capital*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ARKADIY DUBOVOY, et al.,

Defendants.

DOCKET NO.: 15-CV-06076 (MCA-MAH)

**[PROPOSED] ORDER GRANTING THE
AMARYAN DEFENDANTS' RULE 59(E)
AND 65 MOTION TO MODIFY THE
COURT'S OCTOBER 16, 2015 ORDER
FREEZING ASSETS**

On October 16, 2015, the Court entered an Order freezing the assets of Defendants David Amaryan, Ocean Prime, Inc., Intertrade Pacific SA, Copperstone Capital, and Copperstone Alpha Fund's (collectively, "the Amaryan Defendants") and prohibiting the destruction of documents. Dkt. 118.

WHEREAS the Court above-captioned motion to modify was filed on November 13, 2015 and came before me, and after considering the parties' arguments and on good cause appearing, the Amaryan Defendants' Motion to Modify the Court's October 16, 2015 Order Freezing Assets is granted as set forth below, and

NOW THEREFORE, IT IS HEREBY ORDERED that the Court's October 16, 2015 Order Freezing Assets of the Amaryan Defendants is hereby modified immediately as follows:

1. The overall amount of assets frozen shall be reduced to \$10 million, in the Copperstone Capital and Copperstone Alpha Fund accounts.

2. Effective immediately, trading is allowed to resume in the Copperstone Alpha Fund accounts.

3. The duration of the Court's October 16, 2015 Order Freezing Assets and this modified asset freeze order shall be no longer than four months, or February 15, 2016.

4. The following funds shall be immediately released for business expenses and legal fees:

- (a) \$272,800 per month for monthly business expenses of Copperstone Capital;
- (b) \$300,000 for year-end employee bonuses; and
- (c) \$100,000 per month for payment of legal fees.

5. Prior management fees owed of \$68,000, shall be immediately released to be paid to Copperstone Capital as shall prior expenses since September 1, 2015 for rent, payroll, and taxes.

IT IS HEREBY FURTHER ORDERED that the Court shall retain jurisdiction of the matter for all purposes, including enforcing and further modifying the terms of the Order.

IT IS SO ORDERED
ON THIS ____ DAY OF _____, 2015

HON. MADELINE COX ARLEO
U.S.D.J.